

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 22-cv-10336 (AT) (GWG)  
[Rel. 20-cv-3389]

LOCAL 2507, UNIFORMED EMTs, PARAMEDICS & :  
FIRE INSPECTORS, Individually and on :  
behalf of its current and former members; :  
LOCAL 3621, EMS OFFICERS UNION, :  
Individually and on behalf of its current :  
and former members; NYC EMS SUPERIOR :  
OFFICERS ASSOCIATION, Individually and on :  
behalf of its current and former members; :  
TONYA BOYD, CHRISTELL CADET, MARK :  
CARRASQUILLO, LIZETTE CLARO, BEVERLY :  
COBB, ALI COUTARD, SENCIA DATILUS, :  
LAITRICE EDWARDS, ALICIA ELKADI, RONALD :  
FLOYD, KAHLIA GRAHAM, RICHARD GUZMAN, :  
MAGGIE HOPE, JASMIN HOWARD, ANGELA JONES, :  
RAVIVARMAN KAILAYANATHAN, MELANIE MORENO- :  
KETCHUM, JENELLE PIERRE, SIMONE QUASHIE, :  
JASON SAFFON, ALLISON SHAUGHNESSY, :  
LAURA TORRES, ANDRE VALDEZ, LANCE :  
WINFIELD, RONALD WOLFE, MARYLOU :  
AURRICHIO on behalf of themselves and all :  
other similarly-situated individuals, :  
Plaintiffs,

vs.

CITY OF NEW YORK ON BEHALF OF THE FIRE  
DEPARTMENT OF THE CITY OF NEW YORK,  
Defendants.

-----  
DEPOSITION UNDER ORAL EXAMINATION OF:  
RENEE CAMPION  
May 23, 2023  
-----

REPORTED BY: JENNIFER L. WIELAGE, CCR, RPR, CRR  
-----

JOB # 007274

1                   TRANSCRIPT of the remote deposition of the  
2     above-named witness, called for Oral Examination in  
3     the above-entitled matter, said deposition being  
4     taken pursuant to Federal Court Rules, by and before  
5     JENNIFER WIELAGE, Certified Shorthand Reporter and  
6     Notary Public of the State of New York, License No.  
7     XI01916, on Tuesday, May 23, 2023, commencing at  
8     10:00 in the forenoon.

1 the law department, to assess whatever the claim is  
2 and then figure out a path.

3 Q. Okay. And I just want to make sure  
4 we're saying -- you're understanding what I'm saying  
5 because I'm not saying that there's a claim for  
6 improper pay. I'm saying if there's a concern by the  
7 FDNY. So I understand if someone brings, let's say,  
8 a lawsuit or they bring an allegation that the pay is  
9 improper -- I'm not talking about allegations by  
10 outside parties. I'm saying if the agency itself  
11 determines that there is an issue or a concern with  
12 regards to improper pay practice, whether that's  
13 violation of a law or otherwise, I hear you saying  
14 that they don't have an obligation to do anything.  
15 Who, if anyone, does have an obligation? And if your  
16 answer is OLR, OMB with City Hall with corporate  
17 counsel to figure out a path, that's fine but I just  
18 want to make sure we're clear -- clarifying, I'm not  
19 saying an allegation from an outside party of  
20 wrongdoing. I'm saying if the agency finds that it  
21 was paying a title in violation of the law, what, if  
22 any, steps, is it required to take?

23 MS. MINICUCCI: Objection; outside  
24 the scope. You can answer if you can.

25 A. It's not up to the agency to

1 determine the rate of pay.

2 Q. So they have no obligation if they  
3 find -- if they discover that there's an issue in  
4 terms of payment, correct?

5 MS. MINICUCCI: Objection. You can  
6 answer.

7 A. It's not for them to determine their  
8 rate of pay.

9 BY MS. KURLAND:

10 Q. I'm so sorry. I'm just trying to  
11 make a clear record. And I appreciate the testimony  
12 you're giving me but I want you to answer the  
13 question that I'm asking. I understand you're saying  
14 it's not for them to determine the rate of pay. I'm  
15 asking do they have an obligation to bring to  
16 anyone's attention a concern, if they have one, with  
17 regards to the pay process and the -- and the pay  
18 practices of that agency if they believe it might be  
19 in violation of a law or might be -- have some other  
20 concern?

21 MS. MINICUCCI: Objection. Outside  
22 the scope. You can answer again.

23 A. If an agency thinks they're not  
24 paying someone correctly, they can bring it to  
25 whatever oversight agencies are required in order to

1 assess the question.

2 BY MS. KURLAND:

3 Q. Okay. They can. Are they required  
4 to?

5 MS. MINICUCCI: Objection; outside  
6 the scope. You can answer.

7 A. I have no idea.

8 Q. And when you say the outside  
9 oversight agencies, what are those outside oversight  
10 agencies?

11 MS. MINICUCCI: Objection; outside  
12 the scope. You can answer.

13 A. OLR, OMB, law department, OPA FISA.

14 Q. Anyone else?

15 A. Ultimately City Hall.

16 Q. And when you say City Hall, are you  
17 talking about the mayor?

18 MS. MINICUCCI: Objection. You can  
19 answer.

20 A. I'm talking about staff that worked  
21 for the mayor.

22 Q. The mayor's office, let's say,  
23 correct?

24 MS. MINICUCCI: Objection. You can  
25 answer.

1 A. Staff that worked for the mayor.

2 Q. Okay. Any staff in particular?

3 MS. MINICUCCI: Objection. You can  
4 answer.

5 A. The mayor's counsel.

6 Q. Anyone else?

7 A. The mayor's counsel's office.

8 Q. Okay. Anyone else?

9 A. No.

10 Q. So is it your testimony that OLR,  
11 OMB, OPA/FISA and corporation counsel have oversight  
12 over the FDNY?

13 MS. MINICUCCI: Objection. You can  
14 answer.

15 A. In regard to what?

16 Q. Well, you had testified that if they  
17 wanted to, an agency like the FDNY could bring to the  
18 attention of those -- of those agencies concerns with  
19 regards to pay practices?

20 A. Yes.

21 Q. I'm asking -- go ahead.

22 A. No, what's the question?

23 Q. Do those agencies have oversight over  
24 the FDNY?

25 MS. MINICUCCI: Objection. This is

1 outside the scope. You can answer.

2 A. They have oversight in regard to  
3 their specific areas.

4 Q. Over the FDNY?

5 A. In regards to their core functions of  
6 what they do.

7 Q. Okay. But do they have oversight  
8 over this issue of the FDNY's concerns with regards  
9 to -- or the hypothetical concern with regards to  
10 violating the law with regard to pay practices?

11 MS. MINICUCCI: Objection; this is  
12 outside the scope. You can answer.

13 A. I don't know if I would call it  
14 oversight. I don't believe -- I don't know that it's  
15 oversight. It's relevant agencies that would go to  
16 discussing the issue.

17 BY MS. KURLAND:

18 Q. Okay. Other than -- and then what  
19 would OLR's role be if an agency came to you and  
20 said, "Hey, I think that we are paying employees  
21 below the weekly allowable rate," what, if any,  
22 remedies could OLR take to address that, if they  
23 could?

24 MS. MINICUCCI: Objection. This is  
25 outside the scope. You could answer.

1 A. Can you repeat the question?

2 BY MS. KURLAND:

3 Q. Let me rephrase it. If an agency  
4 came to you and said, "Hey, I'm concerned that we are  
5 paying some of our employees below what we are  
6 legally obligated to pay," what, if any, steps would  
7 OLR take with regards to that?

8 MS. MINICUCCI: Objection. This is  
9 outside the scope. You could answer.

10 A. We would ask them what the basis of  
11 their understanding is.

12 BY MS. KURLAND:

13 Q. Okay. Is OLR involved in resolving  
14 issues with pay disparity claims for the titles in  
15 the City's workforce?

16 MS. MINICUCCI: Objection. This is  
17 outside the scope. You can answer.

18 A. Oftentimes, yes.

19 Q. Can you explain, for example, what --  
20 how that would work?

21 MS. MINICUCCI: Objection. This is  
22 outside the scope. You can answer.

23 MS. KURLAND: Let me withdraw that  
24 and rephrase it.

25 BY MS. KURLAND:



1 Q. If there's a concern that there is a  
2 discriminatory pay practice and that that pay  
3 practice needs to be resolved, does OLR have the  
4 authority to address and resolve those concerns?

5 MS. MINICUCCI: Objection. This is  
6 outside the scope. You can answer.

7 A. Not OLR, no.

8 Q. What agency does?

9 MS. MINICUCCI: Objection. This is  
10 outside the scope. You can answer.

11 A. The law department.

12 Q. Okay. Other than the law department,  
13 anyone else?

14 A. No.

15 Q. Any other agency?

16 A. No.

17 Q. Is it the FDNY's responsibility to  
18 ensure that it's not discriminating in its employment  
19 practices?

20 MS. MINICUCCI: Objection. You can  
21 answer.

22 A. What's the question again?

23 Q. Is it the FDNY's responsibility to  
24 ensure that it is not discriminating in its  
25 employment practices?

1 MS. MINICUCCI: Objection; outside  
2 the scope. You can answer.

3 A. Can you repeat it one more time?

4 Q. Yes. Is it the FDNY's responsibility  
5 to ensure that it's not discriminating in its  
6 employment practices?

7 MS. MINICUCCI: Objection; you can  
8 answer. This is outside the scope.

9 A. Yes.

10 Q. And just going back to -- you had  
11 said that the agency that could address issues with  
12 pay disparity -- types of discriminatory pay  
13 practices is corporation counsel, do you know how  
14 corporation counsel would resolve those concerns?  
15 Are you talking about litigation or something else?

16 MS. MINICUCCI: Objection. This is  
17 outside the scope. You can answer.

18 A. They would do their own  
19 investigation.

20 Q. Okay. So corporation counsel is  
21 tasked with investigating claims of discriminatory  
22 pay practices for the City of New York?

23 MS. MINICUCCI: Objection; this is  
24 outside the scope. You can answer.

25 A. I believe so, yes.

1 Q. Do you know if there's a specific  
2 office or unit that does that within corporation  
3 counsel?

4 MS. MINICUCCI: Objection; this is  
5 outside the scope. You can answer.

6 A. I don't know.

7 Q. Do -- are fire first responders  
8 uniform?

9 A. What does fire first responders mean  
10 again?

11 Q. It's the firefighters and their line  
12 of promotions, so the officers on the fire side, the  
13 battalion chiefs, deputy chiefs, so on, lieutenants?

14 A. What was the question?

15 Q. Are they uniform?

16 A. Yes.

17 Q. And are EMS first responders uniform?

18 A. I don't know -- your question is  
19 vague. I don't know what you're referring to.

20 Q. Well, you were able to answer it when  
21 I asked you about fire first responders, so what is  
22 vague about the question?

23 A. I don't know in terms -- in what  
24 terms you mean uniform.

25 Q. In what terms did you mean "uniform,"